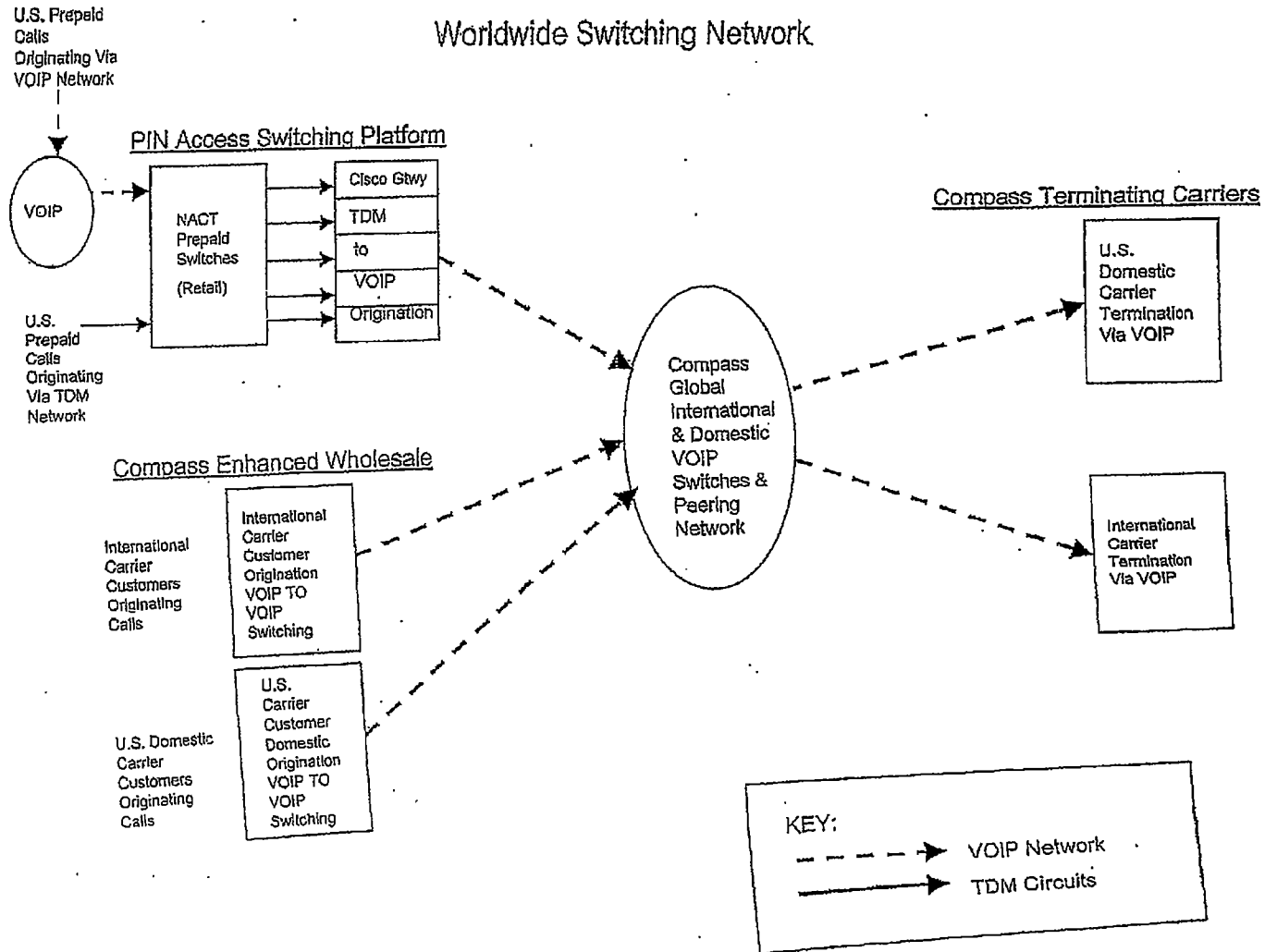


# ATTACHMENT 1

## Network Diagram

# Compass Global

## Worldwide Switching Network



ATTACHMENT 2

Revised FCC Form 499-As

## 2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Approval by OMB  
3060-0855

&gt;&gt;&gt; Please read instructions before completing. &lt;&lt;&lt;

Annual Filing -- due April 1, 2007

During the year, filers must refile blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (888) 641-8722.

826216

If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.]

102 Legal name of reporting entity

Compass Global, Inc.

103 IRS employer identification number

Enter 9 digit number 22-3559398

104 Name telecommunications provider is doing business as

105 Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see directions.]

- |  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> CAP/CLEC                                      | <input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale) | <input type="checkbox"/> Coaxial Cable                   | <input type="checkbox"/> Incumbent LEC              |
| <input type="checkbox"/> Interconnected VoIP                           | <input type="checkbox"/> Interexchange Carrier (IXC)                           | <input type="checkbox"/> Operator Service Provider (OSP) | <input type="checkbox"/> Paging & Messaging         |
| <input type="checkbox"/> Payphone Service Provider                     | <input type="checkbox"/> Local Reseller  | <input type="checkbox"/> Private Service Provider        | <input type="checkbox"/> Satellite Service Provider |
| <input type="checkbox"/> Shared-Tenant Service Provider / Building LEC | <input type="checkbox"/> Prepaid Card  | <input type="checkbox"/> Toll Reseller                   | <input type="checkbox"/> Wireless Data              |
|  | <input type="checkbox"/> SMR (dispatch)  | <input type="checkbox"/> Other Mobile                    | <input checked="" type="checkbox"/> Other Toll      |

If Other Local, Other Mobile or Other Toll is checked,

☐ Other Local

describe carrier type / services provided: →

PIN Platform Service

106.1 Holding company name (All affiliated companies must show the same name on this list.)

[Enter 9 digit number]

106.2 Holding company IRS employer identification number

107 FCC Registration Number (FRN) [ https://svrntfoss2.fcc.gov/cores/CoresHome.html ]  
(For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov)

[Enter 10 digit number]

0009-6902-56

108 Management company (if filer is managed by another entity)

109 Complete mailing address of reporting entity  
corporate headquartersNote: this address will be used for the ITSP FCC regulatory  
fee billings unless the appropriate box is checked on Line 208110 Complete business address for customer inquiries and  
complaintscheck if same address as Line 109 ☒

Street 1	50 Tice Boulevard	State	NJ	Zip (postal code)	07677	Country if not USA
Street 2	3rd Floor					
Street 3	Woodcliff Lake					
City						
Street 1						
Street 2						
Street 3						
City						

111 Telephone number for customer complaints and inquiries (Toll-free number if available)

112 List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.

a. Forval International

b.

c.

d.

e.

f.

Use an additional sheet if necessary. Each reporting entity must provide all names used for telecommunications activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

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January 2007

## 2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Page 2

Block 2A Regulatory Contact Information	
201 Filer 499 ID [from Line 101]	826216
202 Legal name of reporting entity [from Line 102]	Compass Global, Inc.
203 Person who completed this Worksheet	First Jonathan M S. Last Marashlian
204 Telephone number of this person	(703) 714-1300 ext -
205 Fax number of this person	(703) 714-1330
206 Email of this person    Required if available -- not for public release	jsm@commlawgroup.com
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Office Compass Global, Inc. Attn Firstname Dean M Last Cary Email [required if available, not for public release] Phone (201) 802-0500 Fax ( ) - Street1 deancary@compassglobal.net Street2 Street3 City State Zip (postal code) Country if not USA check if same name as Line 203 <input type="checkbox"/> check if same address as Line 109 <input checked="" type="checkbox"/>
208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	Company Attn Firstname M Last Email [required if available, not for public release] Phone ( ) - ext - Fax ( ) - Street1 Street2 Street3 City State Zip (postal code) Country if not USA check if name and address same as Line 207 <input checked="" type="checkbox"/> check to use Line 208 information for FCC ITSP regulatory fee bill <input type="checkbox"/>
All carriers and providers of interconnected VoIP must complete Lines 209 through 213. During the year, carriers and providers of interconnected VoIP must file Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.	
209 D.C. Agent for Service of Process per 47 U.S.C. § 413	Company Attn Firstname Jerold M Last Schneider
210 Telephone number of D.C. agent	(202) 393-6222 ext -
211 Fax number of D.C. agent	( ) -
212 Email of D.C. agent    Required if available	
213 Complete business address of D.C. agent for hand service of documents	Street1 801 Pennsylvania Avenue, NW Street2 Suite 600 Street3 City Washington DC Zip 20004 Company Helein & Marashlian, LLC Attn Firstname Jonathan M Last Marashlian The CommLaw Group, 703-714-1300 ext - (703) 714-1330 jsm@commlawgroup.com
214 Local/alternate Agent for Service of Process (optional)	
215 Telephone number of local/alternate agent	
216 Fax number of local/alternate agent	
217 Email of local/alternate agent    Required if available	
218 Complete business address of local/alternate agent for hand service of documents	Street1 1483 Chain Bridge Road Street2 Suite 301 Street3 City McLean State VA Zip (postal code) 22101 Country if not USA check to use Line 218 information for FCC ITSP regulatory fee bill <input type="checkbox"/> (If both Line 208 and Line 218 are checked, Line 208 will be used.)
PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001	
Save time, avoid problems -- file electronically at <a href="http://forms.universalservice.org">http://forms.universalservice.org</a>	

FCC Form 499-A  
January 2007

## 2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Page 3

Filers must refile Blocks 1, 2 and 6 if there are any changes in this section. See instructions.

219 Filer 499 ID (from Line 101)	826216		
220 Legal name of reporting entity (from Line 102)	Compass Global, Inc.		
221 Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)	First Dean	M	Last Cary
222 Business address of individual named on Line 221	Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA		
check if same as Line 109 <input checked="" type="checkbox"/>			
223 Second ranking company officer, such as Chairman (Must be someone other than the individual listed on Line 221)	First	M	Last
224 Business address of individual named on Line 223	Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA		
check if same as Line 109 <input type="checkbox"/>			
225 Third ranking company officer, such as President or Secretary (Must be someone other than individuals listed on Lines 221 or 223)	First	M	Last
226 Business address of individual named on Line 225	Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA		
check if same as Line 109 <input type="checkbox"/>			
227 Indicate jurisdictions in which the filing entity provides service. Include jurisdictions in which service was provided in the past 15 months and jurisdictions in which service is likely to be provided in the next 12 months.			
<input type="checkbox"/> Alabama	<input type="checkbox"/> Guam	<input type="checkbox"/> Massachusetts	<input checked="" type="checkbox"/> New York
<input type="checkbox"/> Alaska	<input type="checkbox"/> Hawaii	<input type="checkbox"/> Michigan	<input type="checkbox"/> North Carolina
<input type="checkbox"/> American Samoa	<input type="checkbox"/> Idaho	<input type="checkbox"/> Midway Atoll	<input type="checkbox"/> North Dakota
<input type="checkbox"/> Arizona	<input type="checkbox"/> Illinois	<input type="checkbox"/> Minnesota	<input type="checkbox"/> Northern Mariana Islands
<input type="checkbox"/> Arkansas	<input type="checkbox"/> Indiana	<input type="checkbox"/> Mississippi	<input type="checkbox"/> Ohio
<input type="checkbox"/> California	<input type="checkbox"/> Iowa	<input type="checkbox"/> Missouri	<input type="checkbox"/> Oklahoma
<input type="checkbox"/> Colorado	<input type="checkbox"/> Johnston Atoll	<input type="checkbox"/> Montana	<input type="checkbox"/> Oregon
<input type="checkbox"/> Connecticut	<input type="checkbox"/> Kansas	<input type="checkbox"/> Nebraska	<input type="checkbox"/> Pennsylvania
<input type="checkbox"/> Delaware	<input type="checkbox"/> Kentucky	<input type="checkbox"/> Nevada	<input type="checkbox"/> Puerto Rico
<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New Hampshire	<input type="checkbox"/> Rhode Island
<input type="checkbox"/> Florida	<input type="checkbox"/> Maine	<input checked="" type="checkbox"/> New Jersey	<input type="checkbox"/> South Carolina
<input type="checkbox"/> Georgia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New Mexico	<input type="checkbox"/> South Dakota
<input type="checkbox"/> Tennessee	<input type="checkbox"/> Texas	<input type="checkbox"/> Utah	<input type="checkbox"/> U.S. Virgin Islands
<input type="checkbox"/> Vermont	<input type="checkbox"/> Virginia	<input type="checkbox"/> Wake Island	<input type="checkbox"/> Washington
<input type="checkbox"/> West Virginia	<input type="checkbox"/> Wisconsin	<input type="checkbox"/> Wyoming	

228 Year and month filer first provided (or expects to provide) telecommunications in the U.S. ☐ Check if prior to 1/1/1999, otherwise Year Month

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FCC Form 499-A  
January 2007

## Block 2: Carrier's Carrier Revenue Information

301 Filer 499 ID [from Line 101]

826216

302 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

Report billed revenues for January 1 through December 31, 2006.

Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.

See instructions regarding percent interstate &amp; international.

Revenues from Services Provided for Resale as Telecommunications by Other Contributors to Federal Universal Service Support Mechanisms

Fixed local service

Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs

303.1 Provided as unbundled network elements (UNEs)

303.2 Provided under other arrangements

Per-minute charges for originating or terminating calls

304.1 Provided under state or federal access tariff

304.2 Provided as unbundled network elements or other contract arrangement

Local private line & special access service

305.1 Provided to other contributors for resale as telecommunications

305.2 Provided to other contributors for resale as interconnected VoIP  
[All such revenue for 2006 must be reported as end-user revenue]

306 Payphone compensation from toll carriers

307 Other local telecommunications service revenues

308 Universal service support revenues received from Federal or state sources

Mobile services (including wireless telephony, paging & messaging, and other mobile services)

309 Monthly, activation, and message charges except toll

Toll services

310 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)

311 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)

312 Long distance private line services

313 Satellite services

314 All other long distance services

315 Total revenues provided for resale (Lines 303 through 314)

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers was a direct contributor to the federal universal service support mechanism for calendar year 2006 and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. The FCC website contains information on federal universal service contributors. (See instructions.)

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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## 2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Page 5

100 Line and User Telecommunications Revenue Information		826216			
401 Filer 499 ID [from Line 101]		Compass Global, Inc.			
402 Legal name of reporting entity [from Line 102]		Compass Global, Inc.			
Report billed revenues from January 1 through December 31, 2006. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.		Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts
		(a)	Interstate (b)	International (c)	Interstate Revenues (d)
					International Revenues (e)
<b>Revenues from All Other Sources (end-user telecom, &amp; non-telecom.)</b>					
403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions					
<b>Fixed local services</b>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges					
<b>traditional circuit-switched</b>					
404.1 Provided at a flat rate including interstate toll service -- local portion					
404.2 Provided at a flat rate including interstate toll service -- toll portion					
404.3 Provided without interstate toll included (see instructions)					
<b>interconnected VoIP</b>					
404.4 Offered in conjunction with a broadband connection					
404.5 Offered independent of a broadband connection					
405 Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer					
406 Local private line & special access service [Through August 13, 2006, includes the transmission portion of wireline broadband Internet access. After August 13, 2006, includes the transmission portion of wireline broadband Internet access provided on a common carrier basis.]					
407 Payphone coin revenues (local and long distance)					
408 Other local telecommunications service revenues					
<b>Mobile services (including wireless telephony, paging, &amp; messaging, and other mobile services)</b>					
409 Monthly and activation charges					
410 Message charges including roaming and air-time charges for toll calls, but excluding separately stated toll charges					

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2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Page 6

		Total Revenues (a)	If breakouts are not book amounts, enter whole percentage estimates Interstate International		Breakouts Interstate Revenues (d)	International Revenues (e)
<b>Toll services</b>						
411	Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards					
412	International calls that both originate and terminate in foreign points		0%	100%		
413	Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412					
	Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, POC, pass-through, and other switched services not reported above)	20,402,014			102,105	20,299,909
414.1	All, other than interconnected VoIP, including, but not limited to, itemized toll on wireline and wireless bills					
414.2	All interconnected VoIP long distance, including, but not limited to, itemized toll					
415	Long distance private line services					
416	Satellite services					
417	All other long distance services					
	Revenues other than U.S. telecommunications revenues, including information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues. (See instructions.)					
418.1	bundled with circuit switched local exchange service					
418.2	bundled with interconnected VoIP local exchange service					
418.3	other	32,338,201				
<b>Block 405: Total revenues and non-collectible revenue information</b>						
419	Gross billed revenues from all sources (incl. reseller & non-telecom.) (Lines 303 through 314 plus Lines 403 through 418)	52,740,215				
420	Gross universal service contribution base amounts (Lines 403 through 411 Lines 413 through 417) See Figure 4 in instructions.	52,740,215				
421	Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419 (See Instructions Page 26)					
422	Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420					
423	Net universal service contribution base revenues (Line 420 minus line 422)	20,402,014			102,105	20,299,909

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Page 7

Block 5: Additional Revenue Breakouts

501 Filer 499 ID (from Line 101)

502 Legal name of reporting entity (from Line 102)

Filers that report revenues in Block 3 and Block 4 must provide the percentages requested in Lines 503 through 510. See page 27 of instructions for limited exceptions.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

		Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)	
503	Southeast: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands	%		%
504	Western: Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming	%		%
505	West Coast: California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island.	%		%
506	Mid-Atlantic: Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia	%	100	%
507	Mid-West: Illinois, Indiana, Michigan, Ohio, and Wisconsin	%		%
508	Northeast: Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont	%		%
509	Southwest: Arkansas, Kansas, Missouri, Oklahoma, and Texas	%		%
510	Total (Percentages must add to 0 or 100.)	%		%

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

	(a)	(b)
	Total Revenues	Interstate and International
Revenues from resellers that do not contribute to Universal Service	\$	\$

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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January 2007

## 2007 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2006 Revenues)

Page 8

Block 6: CERTIFICATION to be signed by an officer of the filer

601 Filer 499 ID (from Line 101)

602 Legal name of reporting entity (from Line 102)

Section IV of the Instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

I certify that the reporting entity is an interconnected VoIP filer because subject to FCC Form 499 filing requirements on or after August 1, 2006 and therefore is reporting revenues in Blocks 3, 4, and 5 for the fourth quarter of 2006 instead of for the entire calendar year. ☐

Provide explanation below:

604 Please indicate whether the reporting entity is

State or Local Government Entity ☐I.R.C. § 501(c)(3) Exempt ☐

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☒

I certify that I am an officer of the above-named reporting entity as defined on page 28 of the instructions, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature

First

Dean

M

Last Cary

607 Printed name of officer

CEO

608 Position with reporting entity

(201) 802-0600

ext -

609 Business telephone number of officer

deancary@compassglobal.net

610 Email of officer || Required if available -- not for public release ||

7/30/07

611 Date

612 Check those that apply:

☐ Original April 1 filing for year☐ New filer, registration only☐ Revised filing with updated registration☒ Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Information: (888) 641-8722 or via email: Form499@universalservice.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A  
January 2007

2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

>>> Please read instructions before completing. <<<

Approval by OMB  
3060-0855

Annual Filing -- due April 1, 2006

Block 1 Contributor identification information

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See Instructions.

101 Filer 499 ID [If you don't know your number, contact the administrator at (888) 641-8722. 826216

If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.

102 Legal name of reporting entity Compass Global, Inc.

103 IRS employer identification number [Enter 9 digit number] 22-3559398

104 Name telecommunications service provider is doing business as

105 Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see directions.]

- |  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> All Distance  | <input type="checkbox"/> CAP/LEC                     | <input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale) | <input type="checkbox"/> Coaxial Cable              |
| <input type="checkbox"/> Incumbent LEC                                       | <input type="checkbox"/> Interexchange Carrier (IXC) | <input type="checkbox"/> Local Reseller  | <input type="checkbox"/> Paging & Messaging         |
| <input type="checkbox"/> Payphone Service Provider                           | <input type="checkbox"/> Prepaid Card                | <input type="checkbox"/> Operator Service Provider (OSP)                       | <input type="checkbox"/> Satellite Service Provider |
| <input type="checkbox"/> Shared-Tenant Service Provider / Building LEC       | <input type="checkbox"/> SMR (dispatch)              | <input type="checkbox"/> Private Service Provider                              | <input type="checkbox"/> Wireless Data              |
| <input type="checkbox"/> Other Local, Other Mobile or Other Toll is checked, | <input type="checkbox"/> Other Local                 | <input type="checkbox"/> Toll Reseller   | <input type="checkbox"/> Other Toll                 |

describe carrier type / services provided: → PIN Platform Service

106.1 Holding company name (All affiliated companies must show the same name on this line.)

106.2 Holding company IRS employer identification number [Enter 9 digit number]

107 FCC Registration Number (FRN) [ https://svrftfoss2.fcc.gov/cores/CoresHome.html ] . 0009-6902-56  
[For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov] [Enter 10 digit number]

108 Management company (If carrier is managed by another entity)

109 Complete mailing address of reporting entity corporate headquarters

Note: this address will be used for the ITSP FCC regulatory fee billings unless the appropriate box is checked on Line 208.

110 Complete business address for customer inquiries and complaints

check if same address as Line 109 ☒

Street1 50 Tice Boulevard  
Street2 3rd Floor  
Street3  
City Woodcliff Lake State NJ Zip (postal code) 07677 Country if not USA

111 Telephone number for customer complaints and inquiries (Toll-free number if available) ext -

112 List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.

a. Forval International

b.

c.

d.

e.

f.

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A  
April 2006

## 2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 2

## Block 2A Regulatory Contact Information

201 Filer 499 ID [from Line 101]	826216
202 Legal name of reporting entity [from Line 102]	Compass Global, Inc.
203 Person who completed this Worksheet	First Jonathan MI S. Last Marashlian
204 Telephone number of this person	(703) 714-1300 ext -
205 Fax number of this person	(703) 714-1330
206 Email of this person    Required if available	jsm@commlawgroup.com
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Office Compass Global, Inc. Attn First name Dean MI Last Cary Email [required if available] Phone (201) 802-0500 Fax ( ) - Street1 deancary@compassglobal.net Street2 Street3 City State Zip (postal code) Country if not USA check if same name as Line 203 <input type="checkbox"/> check if same address as Line 109 <input checked="" type="checkbox"/>
208 Billing address and billing contact person: (Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.)	Company Email [required if available] Attn First name MI Last Street1 Street2 Street3 City State Zip (postal code) Country if not USA check if name and address same as Line 207 <input checked="" type="checkbox"/> check to use Line 208 information for FCC ITSP regulatory fee bill <input type="checkbox"/>

All carriers must complete Lines 209 through 213.

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See instructions.

209 D.C. Agent for Service of Process per 47 U.S.C. § 413	Company Jerold MI Last Schneider (202) 393-6222 ext -
210 Telephone number of D.C. agent	( ) -
211 Fax number of D.C. agent	
212 Email of D.C. agent    Required if available	
213 Complete business address of D.C. agent for hand service of documents	Street1 801 Pennsylvania Avenue, NW Street2 Suite 600 Street3 City Washington State DC Zip 20004 Company Helein & Marashlian, LLC Attn First name Jonathan MI Last Marashlian
214 Local/alternate Agent for Service of Process (optional)	The CommLaw Group - 703-714-1300 ext -
215 Telephone number of local/alternate agent	(703) 714-1330
216 Fax number of local/alternate agent	jsm@commlawgroup.com
217 Email of local/alternate agent    Required if available	Street1 1483 Chain Bridge Road Street2 Suite 301 Street3 City McLean State VA Zip (postal code) 22101 Country if not USA
218 Complete business address of local/alternate agent for hand service of documents	

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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## 2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 3

Carriers must refile Blocks 1, 2 and 6

if there are any changes in this section. See Instructions.

219 Filer 499 ID (from Line 101)	826216		
220 Legal name of reporting entity (from Line 102)	Compass Global, Inc.		
221 Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)	First Dean	MI	Last Cary
222 Business address of individual named on Line 221	Street1 Street2 Street3 City	State	Zip (postal code) Country (if not USA)
check if same as Line 109 <input checked="" type="checkbox"/>			
223 Second ranking company officer, such as Chairman (Must be someone other than the individual listed on Line 221)	First	MI	Last
224 Business address of individual named on Line 223	Street1 Street2 Street3 City	State	Zip (postal code) Country (if not USA)
check if same as Line 109 <input type="checkbox"/>			
225 Third ranking company officer, such as President or Secretary (Must be someone other than individuals listed on Lines 221 or 223)	First	MI	Last
226 Business address of individual named on Line 225	Street1 Street2 Street3 City	State	Zip (postal code) Country (if not USA)
check if same as Line 109 <input type="checkbox"/>			
227 Indicate jurisdictions in which the filing entity provides telecommunications service. Include jurisdictions in which telecommunications service was provided in the past 15 months and jurisdictions in which telecommunications service is likely to be provided in the next 12 months.			
<input type="checkbox"/> Alabama	<input type="checkbox"/> Guam	<input type="checkbox"/> Massachusetts	<input checked="" type="checkbox"/> New York
<input type="checkbox"/> Alaska	<input type="checkbox"/> Hawaii	<input type="checkbox"/> Michigan	<input type="checkbox"/> North Carolina
<input type="checkbox"/> American Samoa	<input type="checkbox"/> Idaho	<input type="checkbox"/> Midway Atoll	<input type="checkbox"/> North Dakota
<input type="checkbox"/> Arizona	<input type="checkbox"/> Illinois	<input type="checkbox"/> Minnesota	<input type="checkbox"/> Northern Mariana Islands
<input type="checkbox"/> Arkansas	<input type="checkbox"/> Indiana	<input type="checkbox"/> Mississippi	<input type="checkbox"/> Ohio
<input type="checkbox"/> California	<input type="checkbox"/> Iowa	<input type="checkbox"/> Missouri	<input type="checkbox"/> Oklahoma
<input type="checkbox"/> Colorado	<input type="checkbox"/> Johnston Atoll	<input type="checkbox"/> Montana	<input type="checkbox"/> Oregon
<input type="checkbox"/> Connecticut	<input type="checkbox"/> Kansas	<input type="checkbox"/> Nebraska	<input type="checkbox"/> Pennsylvania
<input type="checkbox"/> Delaware	<input type="checkbox"/> Kentucky	<input type="checkbox"/> Nevada	<input type="checkbox"/> Puerto Rico
<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New Hampshire	<input type="checkbox"/> Rhode Island
<input type="checkbox"/> Florida	<input type="checkbox"/> Maine	<input checked="" type="checkbox"/> New Jersey	<input type="checkbox"/> South Carolina
<input type="checkbox"/> Georgia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New Mexico	<input type="checkbox"/> South Dakota
			<input type="checkbox"/> Tennessee
			<input type="checkbox"/> Texas
			<input type="checkbox"/> Utah
			<input type="checkbox"/> U.S. Virgin Islands
			<input type="checkbox"/> Vermont
			<input type="checkbox"/> Virginia
			<input type="checkbox"/> Wake Island
			<input type="checkbox"/> Washington
			<input type="checkbox"/> West Virginia
			<input type="checkbox"/> Wisconsin
			<input type="checkbox"/> Wyoming

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2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 4

301 Filer 499 ID [from Line 101]		826216			
302 Legal name of reporting entity [from Line 102]		Compass Global, Inc.			
Report billed revenues for January 1 through December 31, 2005. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.		Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts
		(a)	Interstate (b)	International (c)	Interstate Revenues (d)
See instructions regarding percent Interstate & International.					
Revenues from Services Provided for Resale as Telecommunications by Other Contributors to Federal Universal Service Support Mechanisms					
<i>Fixed local service</i>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs					
303.1 Provided as unbundled network elements (UNEs)					
303.2 Provided under other arrangements					
Per-minute charges for originating or terminating calls					
304.1 Provided under state or federal access tariff					
304.2 Provided as unbundled network elements or other contract arrangement					
305 Local private line & special access service					
306 Payphone compensation from toll carriers					
307 Other local telecommunications service revenues					
308 Universal service support revenues received from Federal or state sources					
<i>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</i>					
309 Monthly, activation, and message charges except toll					
<i>Toll services</i>					
310 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)					
311 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)					
312 Long distance private line services					
313 Satellite services					
314 All other long distance services					

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers was a direct contributor to the federal universal service support mechanism for calendar year 2005 and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. The FCC website contains information on federal universal service contributors. (See instructions.)

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## 2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

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401 Filer 499 ID [from Line 101]		826216				
402 Legal name of reporting entity [from Line 102]		Compass Global, Inc.				
Report billed revenues for January 1 through December 31, 2005. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.		Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
		(a)	Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
Revenues from All Other Sources (end-user telecom. & non-telecom.)						
403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions						
<b>Fixed local services</b>						
Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PCCC charges						
404.1 Provided at a flat rate including interstate toll service						
404.2 Provided without interstate toll included (see instructions)						
405 Tariffed subscriber line charges and PCCC charges levied by a local exchange carrier on a no-PIC customer						
406 Local private line & special access service						
407 Payphone coin revenues (local and long distance)						
408 Other local telecommunications service revenues						
<b>Mobile services (including wireless telephony, paging &amp; messaging, and other mobile services)</b>						
409 Monthly and activation charges						
410 Message charges including roaming, but excluding toll charges						
<b>Toll services</b>						
411 Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards			0%	100%		
412 International calls that both originate and terminate in foreign points						
413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412						
414 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PCCC pass-through, and other switched services not reported above)		18,379,019			3,655	18,375,364
415 Long distance private line services						
416 Satellite services						
417 All other long distance services						
418 Revenues other than U.S. telecommunications revenues, including information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues (See instructions.)		\$24,025,508				

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2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

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Schedule B: Total Revenues and Uncollectible Revenues Information		Total Revenues (a)	Breakouts	
			Interstate Revenues (d)	International Revenues (e)
419	Gross billed revenues from all sources (incl. reseller & non-telecom.) [Lines 303 through 314 plus Lines 403 through 418]	42,404,108	3,655	18,375,364
420	Gross universal service contribution base amounts [Lines 403 through 411 Lines 413 through 417] See Figure 4 in instructions.	42,404,108	3,655	18,375,364
421	Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419 [See Instructions Page 26]			
422	Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420			
423	Net universal service contribution base revenues [Line 420 minus line 422]	42,404,108	3,655	18,375,364

**Block 5: Additional Revenue Breakouts**

501 Filer 499 ID [from Line 101] 826216

502 Legal name of reporting entity [from Line 102] Compass Global, Inc.

Filers that report revenues in Block 3 and Block 4 must provide the percentages requested in Lines 503 through 510. See page 27 of instructions for limited exceptions.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

		Block 3 Carrier's Carrier (a)	%	Block 4 End-User Telecom. (b)	%
503 Southeast:	Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands		%		%
504 Western:	Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming		%		%
505 West Coast:	California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island.		%		%
506 Mid-Atlantic:	Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia		%		%
507 Mid-West:	Illinois, Indiana, Michigan, Ohio, and Wisconsin		%	100	%
508 Northeast:	Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont		%		%
509 Southwest:	Arkansas, Kansas, Missouri, Oklahoma, and Texas		%		%
510 Total	(Percentages must add to 0 or 100.)				

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

(a)	(b)
Total Revenues	Interstate and International
\$	\$

Revenues from resellers that do not contribute to Universal Service

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Block 4 CERTIFICATION to be signed by an officer of the filer

601 Filer 499 ID [from Line 101]

826216

602 Legal name of reporting entity [from Line 102]

Compass Global, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐ NANPA ☐LNP Administration ☐

Provide explanation below:

604 Please indicate whether the reporting entity is

State or Local Government Entity ☐I.R.C. § 501(c)(3) Exempt ☐PUHCA § 34 (a)(1) Exempt ☐

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☒

I certify that I am an officer of the above-named reporting entity as defined on page 28 of the instructions, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature

First Dean

MI

Last Cary

607 Printed name of officer

CEO

608 Position with reporting entity

(201) 802-0500

ext -

609 Business telephone number of officer

deancary@compassglobal.net

610 Email of officer [Required if available]

7/30/07

611 Date

612 Check those that apply:

☐ Original April 1 filing for year☐ New filer, registration only☒ Revised filing with updated registration☒ Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036  
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (888) 641-8722 or via email: Form499@universalservice.org

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FCC Form 499-A  
April 2005<http://forms.universalservice.org>

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**EXHIBIT 9**

**Compass Global Letter Transmitting  
USAC Appeal to Fund Administrators and  
Requesting Cessation of Collection Efforts  
During Pendency of Appeal,  
November 7, 2007**



## The CommLaw Group

HELEIN & MARASHLIAN, LLC  
1483 Chain Bridge Road  
Suite 301  
McLean, Virginia 22101

Telephone: (703) 714-1300  
Facsimile: (703) 714-1330  
E-mail: [mail@CommLawGroup.com](mailto:mail@CommLawGroup.com)  
Website: [www.CommLawGroup.com](http://www.CommLawGroup.com)

Writer's Direct Dial Number  
703-714-1313

Writer's E-mail Address  
[jsm@commlawgroup.com](mailto:jsm@commlawgroup.com)

November 7, 2007

### VIA OVERNIGHT COURIER

Cheryl Collins, Chief  
Revenue and Receivables Operations Group  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 1-A843  
Washington, D.C. 20554

NECA TRS Collections Department  
Interstate TRS Fund  
80 S. Jefferson Road  
Whippany, NJ 07981

ATTN: Tony Lewis

Ahita Vessali  
NeuStar, Inc.  
Loudoun Tech Center  
46000 Center Oak Plaza  
Sterling, VA 20166

*(Via Email and U.S. Mail)*  
Faith Marcotte  
Chief Billing and Collection Agent  
Welch & Company LLP  
1200 - 151 Slater Street  
Ottawa, ON Canada  
K1P 5H3

Re: *Compass Global, Inc.*  
*Filer ID 826216*  
*Letter of Appeal to USAC in Connection with*  
*USAC's Denial of 2005 and 2006 Form 499-A Revisions*

Ladies and Gentlemen:

Enclosed for your records please find a Letter of Appeal, submitted by Compass Global, Inc. ("Compass"), today to the Universal Service Administrative Company. As you will note, through the enclosed letter filing, Compass is appealing USAC's denial of its 2005 and 2006 Form 499-A Revisions ("Revised 499-As").

November 7, 2007  
Page 2

Please update your records accordingly and cease all collection or referrals with respect to invoices issued to Compass, to the extent necessary, to account for the appeals status of the Revised 400-As").

Should you have any questions concerning this matter, please contact the undersigned at (703) 714-1313.

Sincerely yours,



Jonathan S. Marashlian  
HELEIN & MARASHLIAN, LLC  
The CommLaw Group

Attachment

**EXHIBIT 10**

**Compass Global Appeal of TRS  
Notice of Intent to Transfer Debt for Collection,  
February 8, 2008**



## The CommLaw Group

HELEIN & MARASHLIAN, LLC  
1483 Chain Bridge Road  
Suite 301  
McLean, Virginia 22101

Telephone: (703) 714-1300  
Facsimile: (703) 714-1330  
E-mail: [mail@CommLawGroup.com](mailto:mail@CommLawGroup.com)  
Website: [www.CommLawGroup.com](http://www.CommLawGroup.com)

Writer's Direct Dial Number  
703-714-1313

Writer's E-mail Address  
[jsm@commlawgroup.com](mailto:jsm@commlawgroup.com)

February 8, 2008

VIA OVERNIGHT MAIL

Cheryl Collins, Chief  
Revenue and Receivables Operations Group  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 1-A843  
Washington, DC 20554

RE: Compass Global Response to Notice of Debt

Filer ID: 826216  
FRN: 0009690256  
Bill No.: 08TR000515

Dear Ms. Collins:

On behalf of Compass Global, Inc., Filer ID 826216 ("Compass"), its counsel hereby responds to the Commission's January 9, 2008 Notice of Debt. See Attachment 1. In the Notice of Debt, the Commission demands payment of \$268,820.20 for allegedly unpaid TRS Fund contributions, plus interest and penalties.

Compass responds to the Notice of Debt to clarify that:

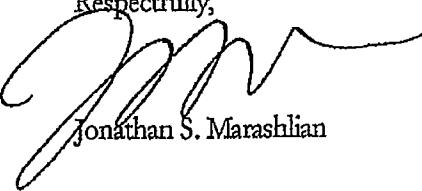
- (1) the amount allegedly owed is inaccurate and inconsistent with the NECA invoice issued on January 31, 2008, see Attachment 2;
- (2) the amount allegedly owed is inaccurate, as it fails to take into consideration a \$104,534.37 credit adjustment resulting from USAC's processing of a Revised 2007 FCC Form 499-A, see Attachment 3; and
- (3) the amount allegedly owed fails to take into consideration the "Appealed" status of USAC denials of Revised 2006 and 2005 Form 499-As, see Attachment 4. Neither

USAC nor the Commission has issued a ruling on Compass' November 6, 2007 Letter of Appeal. Wherefore, until a final determination is rendered, it is premature for either NECA or the Commission to conclude that a debt is owed, as it is equally plausible Compass is owed a refund from NECA.

For all these reasons, and as further detailed in the Attachments hereto, Compass respectfully requests the Commission review these facts and NECA records to determine the correct debt owed, to the extent any debt is presently owed. Furthermore, until such time as the Commission verifies the existence of a valid and enforceable debt, Compass urges the Commission to refrain from pursuing further actions under the Debt Collection Improvement Act (DCLA).

Should you have questions or wish to discuss this matter, please contact the undersigned.

Respectfully,

A handwritten signature in dark ink, appearing to be 'J. Marashlian', written in a cursive style.

Jonathan S. Marashlian

Via E-mail  
cc: Dean Cary

ATTACHMENT 1

FCC Notice of Debt